

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JUAN CARLOS INTERIANO, Individually, and
JUAN CARLOS INTERIANO, as assignee of
ALL-BORO REHAB CONSTRUCTION CORP.,
ALL BORO GROUP LLC, and
ALL-BORO CONSTRUCTION GROUP, INC.,

Case No. 2:23-cv-00238-PKC-AYS

**DECLARATION OF
SHIVANG S. GANDHI**

Plaintiffs,

- against -

ARCH SPECIALTY INSURANCE
COMPANY,

Defendant.

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SHIVANG S. GANDHI hereby declares as follows pursuant to 28 U.S.C. § 1746(2):

1. I am an Associate at DAC Beachcroft LLP (“DACB”), attorneys for Defendant Arch Specialty Insurance Co. (“Arch”) in the above captioned action. Given my role assisting in various aspects of this litigation, I am familiar with the facts and circumstances of this action, and with the prior proceedings herein. I submit this Declaration in Opposition to Plaintiff’s Motion for an Order Disqualifying DACB as counsel for Arch in this Lawsuit.

2. Before joining DACB, I was an Associate at Robinson & Cole LLP (“Robinson”). I was employed by Robinson from November 2021 through and including December 31, 2024. My employment with DACB began on January 1, 2025, when DACB began offering legal services in the United States.

3. DACB’s New York office officially opened for attorneys to work on January 22, 2025. Between January 1 and January 22, when construction of DACB’s New York office was completed enough for DACB’s attorneys to work from the office, I worked from home. Even after

DACB's New York office physically opened on January 22, I work almost exclusively from home. In fact, I have worked from DACB's New York office on no more than five occasions since January 22.

4. On January 22, I received an email from Roderick Clarkson of DACB's Office of the General Counsel stating, in writing, that no former Robinson employees were permitted to discuss this Lawsuit with any DACB employees formerly associated with V&F.

5. Since joining DACB, and even before I received the January 22 email from Mr. Clarkson, I have never spoken about the substance of this Lawsuit with any attorney formerly associated with V&F. I also have never accessed any hard-copy or electronic documents, communications, and/or files of V&F's related to its work in connection with this Lawsuit, and I have not stored and do not store any hard-copy documents and communications related to this Lawsuit in DACB's New York office.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 30, 2025



Shivang S. Gandhi